

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: IRONWOOD FINANCIAL, LLC
Debtor

CHAPTER 11
CASE NO. 21-10866-JDW

**ANSWER AND RESPONSE TO MOTION TO COMPEL ASSUMPTION OR
REJECTION OF HEALTH INSURANCE CONTRACTS, OR ALTERNATIVELY, FOR
RELIEF FROM THE AUTOMATIC STAY TO TERMINATE THE CONTRACTS**

COMES NOW Ironwood Financial, LLC (the “Debtor”), and files this its Answer and Response to the Motion to Compel Assumption or Rejection of Health Insurance Contracts, or Alternatively, for Relief from the Automatic Stay to Terminate the Contracts (the “Motion”) [DK #64], filed herein by Blue Cross & Blue Shield of Mississippi, a Mutual Insurance Company (“BCBSMS”), and, answering the Motion paragraph by paragraph, Debtor answers and alleges as follows, to-wit:

1. Denied. The Debtor does not believe there is a contract between the Debtor and BCBSMS so the Court does not have subject matter jurisdiction herein.

2. Denied. See response to Paragraph No. 1.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Denied, as worded.

8. Admitted.

9. Denied.

10. Admitted.

11. Admitted.

12. The allegations, inferences and conclusions contained in Paragraph 12 of the Motion are denied. Ironwood Holdings, LLC intends to continue to perform its obligations under the contract at issue, however.

13. The allegations, inferences and conclusions contained in Paragraph 13 of the Motion are denied.

14. The allegations, inferences, conclusions and requests contained in Paragraph 14 of the Motion are denied.

15. Admitted as to an order being attached; denied as to entitlement to the relief thereunder.

Last Unnumbered Paragraph

Debtor denies that BCBSMS is entitled to the relief demanded within the Last Unnumbered Paragraph of the Motion or to other relief whatsoever.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof this Honorable Court will enter its order denying the Motion. Debtor prays for general relief.

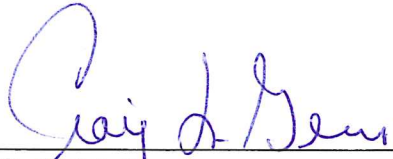
THIS, the 18 day of June, 2021.

Respectfully submitted,

IRONWOOD FINANCIAL, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
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CERTIFICATE OF SERVICE

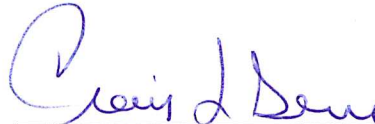
I, Craig M. Geno, do hereby certify that I have caused to be served this date, via email transmission and/or electronic filing transmission, a true and correct copy of the above and foregoing pleading to the following:

Sammye S. Tharp, Esq.
Office of the United States Trustee
sammye.s.tharp@usdoj.gov

Marcus M. Wilson, Esq.
mwilson@blswlaw.com

Andrew R. Wilson, Esq.
awilson@blswlaw.com

THIS, the 12 of June, 2021.



Craig M. Geno